

ORIGINAL

BEFORE THE ARIZONA CORPORATION



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ARIZONA CORPORATION COMMISSION
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IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY REQUEST FOR
APPROVAL OF UPDATED GREEN POWER
RATE SCHEDULE GPS-1, GPS-2, AND GPS-
3.

DOCKET NO. E-01345A-10-0394

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY
FOR APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
FOR RESET OF RENEWABLE ENERGY
ADJUSTOR.

DOCKET NO. E-01345A-12-0290

IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY
FOR APPROVAL OF ITS 2013 RENEWABLE
ENERGY STANDARD IMPLEMENTATION
PLAN AND DISTRIBUTED ENERGY
ADMINISTRATIVE PLAN AND REQUEST
FOR RESET OF ITS RENEWABLE ENERGY
ADJUSTOR.

DOCKET NO. E-01933A-12-0296

IN THE MATTER OF THE APPLICATION OF
UNS ELECTRIC, INC. FOR APPROVAL OF
ITS 2013 RENEWABLE ENERGY
STANDARD IMPLEMENTATION PLAN AND
DISTRIBUTED ENERGY ADMINISTRATIVE
PLAN AND REQUEST FOR RESET OF ITS
RENEWABLE ENERGY ADJUSTOR.

DOCKET NO. E-04204A-12-0297

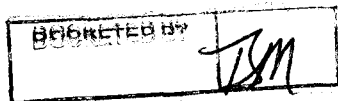
**STAFF'S NOTICE OF FILING
SURREBUTTAL TESTIMONY**

Staff of the Arizona Corporation Commission ("Staff") hereby files the Surrebuttal Testimony
of Robert G. Gray in the above-entitled docket.

RESPECTFULLY SUBMITTED this 22nd day of May, 2013.

Arizona Corporation Commission
DOCKETED

MAY 22 2013



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BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP
Chairman
GARY PIERCE
Commissioner
BRENDA BURNS
Commissioner
BOB BURNS
Commissioner
SUSAN BITTER SMITH
Commissioner

IN THE MATTER OF ARIZONA PUBLIC SERVICE COMPANY REQUEST FOR APPROVAL OF UPDATED GREEN POWER RATE SCHEDULE GPS-1, GPS-2, AND GPS-3)	DOCKET NO. E-01345A-10-0394
IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPEMETATION FOR RESET OF RENEWABLE ENERGY ADJUSTOR)	DOCKET NO. E-01345A-12-0290
IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDAR IMPLEMENTATION PLAN AND DISTRIBUTED ENERGY ADMINISTRATIVE PLAN AND REQUEST FOR RESET OF ITS RENEWABLE ENERGY ADJUSTOR)	DOCKET NO. E-01933A-12-0296
IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC, INC. FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION PLAN AND DISTRIBUTED ENERGY ADMINISTRATIVE PLAN AND REQUEST FOR RESET OF ITS RENEWABLE ENERGY ADJUSTOR)	DOCKET NO. E-04204A-12-0297

SURREBUTTAL
TESTIMONY
OF
ROBERT G. GRAY
EXECUTIVE CONSULTANT III
UTILITIES DIVISION
ARIZONA CORPORATION COMMISSION

MAY 22, 2013

EXECUTIVE SUMMARY
ARIZONA PUBLIC SERVICE COMPANY, ET AL
DOCKET NOS. E-01345A-10-0394, ET AL

My surrebuttal testimony in this proceeding provides Staff's response to rebuttal testimony filed by other parties on May 8, 2013, regarding how the Commission should treat distributed energy for purposes of determining whether jurisdictional utilities are in compliance with the Renewable Energy Standard and Tariff rules.

1 **INTRODUCTION**

2 **Q. Please state your name, occupation, and business address.**

3 A. My name is Robert G. Gray. I am an Executive Consultant III employed by the Arizona
4 Corporation Commission ("ACC" or "Commission") in the Utilities Division ("Staff").
5 My business address is 1200 West Washington Street, Phoenix, Arizona 85007.
6

7 **Q. Are you the same Robert G. Gray that filed Direct Testimony on behalf of Staff in**
8 **this proceeding on April 24, 2013 and Rebuttal Testimony on behalf of Staff in this**
9 **proceeding on May 8, 2013?**

10 A. Yes.
11

12 **Q. What is the scope of this testimony?**

13 A. My Surrebuttal testimony in this proceeding provides Staff's response to rebuttal
14 testimony filed by other parties on May 8, 2013, regarding how the Commission should
15 treat distributed energy for purposes of determining whether jurisdictional utilities are in
16 compliance with the Renewable Energy Standard and Tariff ("REST") rules.
17

18 **Q. Have you reviewed the Rebuttal Testimony of various parties that were filed on May**
19 **8, 2013?**

20 A. Yes. I have reviewed their testimony and will respond to certain proposals and comments
21 in this testimony.
22

1 **Q. Have any parties proposed new ideas in their rebuttal testimony on how utilities**
2 **would demonstrate compliance with the REST requirements when they are no longer**
3 **offering incentives?**

4 A. Yes. Residential Utility Consumer Office ("RUCO") Witness Lon Huber presents a
5 backstop proposal of splitting renewable energy credits ("RECs") between the system
6 owner and the utility on a 50/50 basis.

7
8 **Q. Please comment on this proposal.**

9 A. Staff appreciates RUCO's efforts to put forth different proposals for consideration by the
10 Commission and parties in this proceeding and the 50/50 split would certainly represent a
11 compromise between the interests of the utilities to meet compliance and system owners to
12 retain the RECs. In cases where commercial customers needed RECs to meet internal or
13 external standards, they would be allowed to retain all RECs from their project(s).

14
15 For utilities, receiving only half of the RECs from a given DE project means that they
16 would have to have twice the projects in their service territory to meet their DE
17 requirement in a given year, effectively doubling the DE requirement for utilities. The
18 retention by system owners of only 50% of the REC, does not address the concerns of a
19 taking of property rights that has been raised by several parties. This proposal would also
20 create disparate treatment between residential and certain commercial customers, who are
21 allowed to retain 100% of the related REC. Therefore, it seems that RUCO's proposal
22 will not satisfy either of these concerns.

23
24 If there is financial value in owning RECs, it would seem that all system owners should be
25 treated the same in regard to RECs, so they can receive the same economic benefit from
26 such RECs.

1 **Q. Having reviewed the Rebuttal Testimony of various parties, is Staff changing its**
2 **position that the Commission should not delay addressing the issue in REST**
3 **compliance for utilities in an environment where incentives are small or nonexistent?**

4 A. No. Staff has not seen any new information in this latest round of testimony that would
5 make Staff believe that a significant delay in addressing this issue is in the public interest.
6 This matter has been before the Commission for a long time now, as I discussed in my
7 Rebuttal Testimony, and Staff believes that continuing to delay a decision would provide
8 little value to the Commission and would require significant additional resources from the
9 Commission and parties to have further on-going discussions and proceedings before the
10 Commission. While some utilities and segments may be over compliant under the REST
11 rules, others, such as UNS Electric, are not and need a viable way to achieve compliance
12 sooner, rather than later.

13
14 **Q. RUCO indicates it believes that this compliance issue could work itself out (Huber**
15 **Rebuttal Testimony p. 7, lines 4-5). Do you agree?**

16 A. No. There has been no evidence presented to date in this proceeding indicating that a
17 change in market dynamics or result of some future net metering proceeding will solve the
18 compliance issue within a reasonable period of time. Undoubtedly there will be a variety
19 of changes in the marketplace and possibly in regulatory matters such as net metering, rate
20 design, etc. But such possibilities do not present a compelling argument to let this issue
21 languish for an indeterminate period of time while utilities continue to have compliance
22 obligations to meet under the REST rules.

23
24 APS, TEP, and UNS Electric have all given indications that they expect to exhaust their
25 residential UFI budgets prior to the end of 2013, meaning that the UFI level for all three
26 utilities will trigger to zero. This means that no further residential DE RECs will be

1 acquired by these utilities once this happens. And it would seem unlikely that residential
2 UFIs would be reinstituted in such utilities 2014 REST plans, given the level of market
3 activity at the current minimal incentive level.

4
5 **Q. What is Staff's perception of parties' responses to Staff's Track and Monitor**
6 **proposal?**

7 A. Among the parties that filed rebuttal testimony, the only substantive concern Staff saw
8 regarding its Track and Monitor proposal is that it could represent a double counting of
9 RECs. Parties expressing this concern did not indicate any other concerns to the Track
10 and Monitor proposal.

11
12 TEP expressed support for the Staff proposal while indicating that the utility believed it
13 was a short term proposal. Staff believes that the Track and Monitor proposal could be
14 both a short and long term solution to the issue at hand in this proceeding.

15
16 **Q. A variety of parties have discussed in their direct and rebuttal testimony whether the**
17 **Staff proposal and similar proposals result in the double counting of RECs in some**
18 **fashion. Is there any consensus on whether this is the case?**

19 A. No. The response of parties is all across the board, ranging from certainty that there
20 would be double counting to certainty that there is not double counting and a number of
21 parties expressing various levels of uncertainty. Staff believes that its proposal does not
22 double count RECs, a contention supported by TEP Witness Tilghman who states in his
23 Rebuttal Testimony that under Staff's proposal the fear that RECs would be valueless is
24 "unwarranted and premature" given that such RECs would not be used to meet any REST
25 compliance targets (p.3, lines 15-18). Other parties seem to believe that the mere act of
26 adjusting the REST requirement downward to carve out systems that did not take an

1 incentive from being counted toward the REST requirement is in some manner taking the
2 RECs from such systems. Staff believes that such a reading does not reflect how the
3 Track and Monitor proposal is intended to operate.
4

5 **Q. Do you believe that at least some parties are misconstruing how Track and Monitor**
6 **works?**

7 A. Yes. The very feature of Track and Monitor meant to avoid double counting, carving out
8 systems that do not take an incentive from the REST requirement, and thus expressly not
9 having utilities acquire RECs for that portion of the previous REST requirement
10 percentage, seems to be read by some as somehow involving an acquisition of RECs. This
11 is not the case under Staff's proposal. For example, if in 2025 utilities were acquiring
12 RECs for 13 percent under the REST requirement, and the further two percent represented
13 systems that did not take an incentive, RECs would only be acquired by the utilities for the
14 13 percent, not the two percent, which was explicitly carved out from the REST
15 requirement to make room for those systems that did not take an incentive to retain their
16 RECs.
17

18 **Q. How can the Commission know whether a proposal such as Track and Monitor**
19 **would be perceived as double counting in the marketplace?**

20 A. Unfortunately there is no definitive way of knowing. There is no entity that conclusively
21 decides such matters and none of the parties to this case certify RECs. One entity that is
22 very involved in certifying RECs is the Center for Resource Solutions ("CRS") which
23 operates the Green-e Energy certification and verification program.

1 **Q. Who is CRS?**

2 A. Based in San Francisco, California, CRS' mission is to create policy and market solutions
3 to advance sustainable energy according to its website ([http://www.resource-](http://www.resource-solutions.org)
4 [solutions.org](http://www.resource-solutions.org)). Further, according to CRS' website, its Board of Directors is comprised of
5 "leading experts and legislators dedicated to promoting renewable energy." CRS is not a
6 party to this track and record proceeding and thus has not sponsored a witness, filed
7 testimony, or provided other evidence since this process was initiated in January 2013.

8
9 **Q. Has CRS made any filing in the recent past regarding this general subject?**

10 A. Yes. In the APS and TEP dockets addressing those companies' 2013 REST plans (Docket
11 Nos. E-01345A-12-0290 and E-01933A-12-0296), CRS filed the same letter, on
12 November 16, 2012, discussing the track and record proposal then under discussion. CRS
13 expressed a number of concerns with the track and record proposal, including double
14 counting, complication of utilities' compliance efforts, and administrative complexity. In
15 its letter, CRS advocates for some form of market mechanism such as a standard offer
16 process where utilities would have to acquire RECs from REC owners. CRS' letter
17 further indicates that if such a market option is not viable that it may be possible to have
18 some form of compliance waiver, though CRS does not spell out what such a waiver
19 would look like.

20
21 CRS' letter also notes that one state, Hawaii, modified its renewable portfolio standard
22 ("RPS") eligibility rules to count all customer-sited, grid-connected renewable generation
23 toward meeting the state's RPS goal. Thus, if the Commission were to move toward a
24 solution such as tying REC transfers to net metering or interconnection, there is precedent
25 elsewhere, though of course such an approach would imperil the value of RECs for those
26 who install DG systems.

1 **Q. Have any parties that believe Track and Monitor is double counting indicated that**
2 **Staff's proposal could be adjusted to no longer cause double counting?**

3 A. Yes. RUCO indicated it believed Staff's proposal "could be modified to ensure REC
4 integrity" (Huber Rebuttal Testimony, p.5, lines 20-21). Staff is willing to consider any
5 proposals that might modify Track and Monitor to potentially enhance the likelihood of
6 maintaining REC integrity. However, as stated earlier, Staff believes its Track and
7 Monitor proposal maintains the integrity of the RECs.

8
9 **Q. In the absence of certainty regarding if/how RECs might be certified under the**
10 **Track and Monitor proposal, how should the Commission view Staff's proposal?**

11 A. Staff still believes that its proposal is superior to other options parties have put forward in
12 this proceeding. Staff's intent in crafting the Track and Monitor proposal was to carve out
13 entities that did not take an incentive, such as federal agencies like the Department of
14 Defense, so they could maintain their RECs for their own purposes, yet retain the ACC's
15 interest in seeing its 15 percent renewable energy goal for 2025 reached.

16
17 **Q. Is the uncertainty and discussion of RECs being certified or not causing a loss of**
18 **focus on the real purpose and goal of the REST rules?**

19 A. Yes. Fundamentally, the REST rules are concerned with, among other things, requiring
20 Arizona jurisdictional utilities acquiring a rising percentage of kWhs from renewable
21 energy, reaching 15 percent by 2025. To measure whether a portion of kWhs are
22 achieved, you must measure kWhs. While RECs were included in the REST rules as a
23 means to measure compliance and also to provide possible opportunities for sale, etc.,
24 fundamentally reaching 15 percent of kWhs involves utilities having a certain amount of
25 kWhs each year to measure whether they fall short, achieve, or surpass the percentage
26 REST requirements in any given year. The Commission recognized the value in

1 measuring actual kWh production when it approved APS' request to install production
2 meters on all renewable DE production facilities within APS' service territory, as TEP and
3 UNS had been doing for a number of years. The value in this is that the utilities and the
4 Commission will know the amount of kWhs systems are actually producing, rather than
5 relying on any sort of estimate or other less direct and less accurate measure. The best and
6 most accurate way to measure compliance is for utilities to report actual kWh production
7 and to compare that to the percentage of kWh retail sales each year. Staff supports efforts
8 to maintain the value of RECs for system owners who install renewable DE systems so
9 long as it does not require (1) ratepayers to pay more to deploy DE systems than the
10 market requires, or (2) the Commission to ignore the amount of renewable DE energy
11 being generated in Arizona. Staff believes its Track and Monitor proposal accomplishes
12 both. However, if the Commission believes Staff's Track and Monitor proposal fails to
13 maintain the value of RECs and is not adopted, Staff recommends the Commission
14 deemphasize RECs in Arizona, recognizing that REST compliance is demonstrated most
15 clearly and directly through measured kWhs, not RECs.

16
17 **Q. Specifically what course of action does Staff recommend if Track and Monitor is not**
18 **adopted?**

19 A. Staff would recommend that the Commission move directly to reopen the REST rules for
20 modification if Track and Monitor is not adopted.

21
22 **Q. If the REST rules were reopened under this scenario, would there be a**
23 **predetermined result of how the REST rules would be changed?**

24 A. No. Parties would be free to propose or not propose changes as they see fit.
25

1 **Q. In summary, has Staff's position recommending adoption of the Track and Monitor**
2 **proposal and against delaying this process changed?**

3 A. No.
4

5 **Q. Has Staff prepared a summary of the proposals/alternatives put forward to date in**
6 **this proceeding?**

7 A. Yes. Attached as Exhibit A is a brief summary chart of the proposals and alternatives that
8 have been identified in parties' direct and rebuttal testimony in this proceeding.
9

10 **Q. Does this conclude your rebuttal testimony?**

11 A. Yes, it does.

Exhibit A – Summary of Proposals and Alternatives Put Forth in Direct and Rebuttal Testimony

The table below summarizes the pros and cons of all the proposals and alternatives raised by parties in direct and rebuttal testimony in this proceeding. The table notes how, in Staff's opinion, each proposal meets or does not meet the five important considerations Staff identified in its direct testimony, listed below the table for reference purposes.

Proposal	Pros	Cons
Track and Record	Provides clear method of compliance. Fully recognizes reality of electric load being served in Arizona. Minimizes cost to ratepayers.	Concern with double counting could reduce REC value of DE installations. May require REST rules changes to make permanent.
Track and Monitor	Provides clear method of compliance. Fully recognizes reality of electric load being served in Arizona. Minimizes cost to ratepayers. Maintains REC value of DE installations.	May require REST rules changes to make permanent.
Eliminate DE Carve-out While Maintaining 15% REST Requirement	Provides clear method of compliance. Maintains REC value of DE installations.	Does not recognize DE portion of electric load being served in Arizona. Does not minimize cost to ratepayers. Would require REST rules changes.
Eliminate DE Carve-out While Reducing 15% REST Requirement to 10.5%	Provides clear method of compliance. Minimizes cost to ratepayers. Maintains REC value of DE installations.	Does not recognize DE portion of electric load being served in Arizona. Would require REST rules changes.
Auction	Likely provides method of compliance. Maintains REC value of DE installations. Would not requirement REST rules changes.	May not fully recognize reality of electric load being served in Arizona. Does not minimize cost to ratepayers.
Standard – Offer Process	Likely provides method of compliance. Maintains	May not fully recognize reality of electric load being

	REC value of DE installations. Would not require REST rules changes.	served in Arizona. Does not minimize cost to ratepayers.
Exchange RECs for Net Metering	Likely provides method of compliance. Fully recognizes reality of electric load being served in Arizona. Minimizes cost to ratepayers.	Concern with double counting could reduce REC value of DE installations. May require REST rules changes to make permanent.
Exchange RECs for Interconnection	Likely provides method of compliance. Fully recognizes reality of electric load being served in Arizona. Minimizes cost to ratepayers.	Concern with double counting could reduce REC value of DE installations. May require REST rules changes to make permanent.
Split RECs 50/50 Between Utility and System Owner, With Exceptions	May provide method of compliance. Could maintain REC value of DE installations. Is being proposed as a temporary measure, so no permanent REST rules changes likely required.	Does not fully recognize reality of electric load being served in Arizona. Does not minimize cost to ratepayers.
Null electricity and customer sited systems	This proposal lacked detail but appears to be similar to the Track and Monitor proposal.	

Note: Other proposals are procedural in nature, such as delaying the proceeding in some manner or holding workshops.

Note: Staff's five important considerations, contained on page 6, lines 1—21 of Staff's direct testimony are as follows:

1. Provide a clear and easily documented way for utilities to achieve compliance under the rest rules;
2. Recognize reality regarding how much electric load is actually being met with renewable energy;
3. Minimize the cost to ratepayers;
4. Maximize value to the extent possible for those who undertake DE installations and Arizona as a whole; and
5. Be minimally invasive to the REST rules